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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

WANGS ALLIANCE CORPORATION d/b/a  
WAC LIGHTING CO.,

Plaintiff,

v.

CAST LIGHTING LLC,

Defendant.

Case No: 2:20-cv-3710-MCA-MAH

**DECLARATION OF TIMOTHY R. SHANNON CONCERNING  
CAST LIGHTING LLC'S AND WANGS ALLIANCE CORP.'S  
JOINT SUBMISSION (SUPPORT AND OPPOSITION) RE  
CAST LIGHTING LLC'S MOTION FOR LEAVE TO STAY PROCEEDINGS**

I, Timothy R. Shannon, do hereby on oath depose and state as follows:

1. I am an attorney at the firm Verrill Dana LLP, One Portland Square, Portland, ME 04101, and counsel of record for plaintiff Wangs Alliance Corporation d/b/a WAC Lighting Co. (“WAC”). I am over the age of 18, am fully competent to make this declaration, and make this declaration on personal knowledge.

2. Attached hereto as Exhibit M is a true and accurate copy of U.S. Patent 10,571,101;

3. Attached hereto as Exhibit N is a true and accurate copy of a U.S. Patent and Trademark Office publication, “Trial Statistics – IPR, PGR,CBM – Patent Trial and Appeal Board,” dated November 2020;

4. Attached hereto as Exhibit O is a true and accurate copy of a U.S. Patent and Trademark Office publication, “PTAB Trial Statistics – FY20 End of Year Outcome Roundup – IPR, PGR,CBM,” for Fiscal Year 2020;

5. Attached hereto as Exhibit P is a true and accurate copy of a U.S. Patent and Trademark Office publication, “Patent Trial and Appeal Board Statistics,” dated September 30, 2015;

6. Attached hereto as Exhibit Q is a true and accurate copy of excerpts of the transcript of the deposition of David Beausoleil, dated October 19, 2020.

7. Attached hereto as Exhibit R is a true and accurate copy of the Declaration of Todd Goers in support of Wangs Alliance Corporation’s Opposition to Defendant CAST Lighting, LLC’s Motion to Stay Proceedings, which attaches as Exhibit 6 a true and accurate copy of a computer screen shot taken on January 14, 2021.

Signed under the pains and penalties of perjury this 17<sup>th</sup> day of February, 2021.

s/ *Timothy R. Shannon*

Timothy R. Shannon

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of this document to be filed in accordance with the Court's procedures through the CM/ECF system, to be sent electronically to the registered participants, and paper copies to be sent to those indicated as nonregistered participants.

Dated: February 17, 2021

s/ Bryan N. DeMatteo  
Bryan N. DeMatteo